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CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

June 2011 Grand Jury

10	UNITED STATES OF AMERICA,)	Case No. <u>12CR4599-MMA</u>
11	Plaintiff,)	<u>I N D I C T M E N T</u>
12	v.)	(Superseding)
13	BLAINE POLLOCK,)	Title 26, U.S.C., Sec. 7206(1) -
14	Defendant.)	Filing False Tax Returns; Title 18,
15)	U.S.C., Sec. 2 - Aiding and
16)	Abetting; Title 26, U.S.C.,
)	Sec. 7206(2) - Aiding and
)	Assisting in the Filing of False
)	Tax Returns; Title 18, U.S.C.,
)	Sec. 371 - Conspiracy

The grand jury charges:

Count 1

(False Statement on Individual Tax Return)

In or about April 2007, within the Southern District of California, defendant BLAINE POLLOCK did willfully make and subscribe to a false and fraudulent U.S. Individual Income Tax Return, Form 1040 for the year 2006, which contained and was verified by a written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, and which return defendant BLAINE POLLOCK did not believe to be true and correct as to every material matter in that: (a) the return reported total income on line 22 of \$82,765, whereas, defendant BLAINE POLLOCK knew and believed that his

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1 correct taxable income was in excess of the amount reported on the tax
2 return; and (b) the return reported on Schedule B, Part III, line 7a
3 that defendant BLAINE POLLOCK did not have an interest in or a
4 signature or other authority over a financial account in a foreign
5 country at any time during 2006, whereas, defendant BLAINE POLLOCK
6 knew and believed this statement to be false.

7 All in violation of Title 26, United States Code, Section 7206(1); and
8 Title 18, United States Code, Section 2.

9 Count 2

10 (False Statement on Individual Tax Return)

11 On or about April 14, 2008, within the Southern District of
12 California, defendant BLAINE POLLOCK did willfully make and subscribe
13 to a false and fraudulent U.S. Individual Income Tax Return, Form 1040
14 for the year 2007, which contained and was verified by a written
15 declaration that it was made under penalties of perjury and was filed
16 with the Internal Revenue Service, and which return defendant BLAINE
17 POLLOCK did not believe to be true and correct as to every material
18 matter in that: (a) the return reported total income on line 22 of
19 \$99,520, whereas, defendant BLAINE POLLOCK knew and believed that his
20 correct taxable income was in excess of the amount reported on the tax
21 return; and (b) the return reported on Schedule B, Part III, line 7a
22 that defendant BLAINE POLLOCK did not have an interest in or a
23 signature or other authority over a financial account in a foreign
24 country at any time during 2007, whereas, defendant BLAINE POLLOCK
25 knew and believed this statement to be false.

26 All in violation of Title 26, United States Code, Section 7206(1); and
27 Title 18, United States Code, Section 2.

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Count 3

(False Statement on Individual Tax Return)

On or about April 14, 2009, within the Southern District of California, defendant BLAINE POLLOCK did willfully make and subscribe to a false and fraudulent U.S. Individual Income Tax Return, Form 1040 for the year 2008, which contained and was verified by a written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, and which return defendant BLAINE POLLOCK did not believe to be true and correct as to every material matter in that: (a) the return reported total income on line 22 of \$181,408, whereas, defendant BLAINE POLLOCK knew and believed that his correct taxable income was in excess of the amount reported on the tax return; and (b) the return reported on Schedule B, Part III, line 7a that defendant BLAINE POLLOCK did not have an interest in or a signature or other authority over a financial account in a foreign country at any time during 2008, whereas, defendant BLAINE POLLOCK knew and believed this statement to be false.

All in violation of Title 26, United States Code, Section 7206(1); and
Title 18, United States Code, Section 2.

Count 4

(False Statement on Individual Tax Return).

On or about February 24, 2010, within the Southern District of California, defendant BLAINE POLLOCK did willfully make and subscribe to a false and fraudulent U.S. Individual Income Tax Return, Form 1040 for the year 2009, which contained and was verified by a written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, and which return defendant BLAINE POLLOCK did not believe to be true and correct as to every material

1 matter in that the return reported total income on line 22 of
2 \$421,650, whereas, defendant BLAINE POLLOCK knew and believed that his
3 correct taxable income was in excess of the amount reported on the tax
4 return.

5 All in violation of Title 26, United States Code, Section 7206(1); and
6 Title 18, United States Code, Section 2.

7 Count 5

8 (Aiding and Assisting False Statement on TRPN Corporate Tax Return)

9 In or about 2007, within the Southern District of California,
10 defendant BLAINE POLLOCK did willfully aid and assist in, and procure,
11 counsel, and advise the preparation and presentation to the Internal
12 Revenue Service, of a U.S. Corporation Income Tax Return, Form 1120,
13 of Three Rivers Provider Network for the calendar year 2006. The
14 return and attached Line 26 itemized schedule were false and
15 fraudulent as to material matters, in that: (a) the return represented
16 that Three Rivers Provider Network was entitled under the provisions
17 of the Internal Revenue laws to claim other deductions on line 26 of
18 \$3,592,328, whereas, defendant BLAINE POLLOCK knew and believed that
19 this amount exceeded the deductions Three Rivers Provider Network was
20 entitled to claim on line 26 for the calendar year 2006; and (b) the
21 Line 26 itemized schedule represented that Three Rivers Provider
22 Network had incurred \$783,716 in deductible "technology fees,"
23 whereas, defendant BLAINE POLLOCK knew and believed that this amount
24 exceeded the actual technology fees incurred by Three Rivers Provider
25 Network for the calendar year 2006.

26 All in violation of Title 26, United States Code, Section 7206(2).

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Count 6

(Aiding and Assisting False Statement on TRPN Corporate Tax Return)

In or about 2008, within the Southern District of California, defendant BLAINE POLLOCK did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service, of a U.S. Corporation Income Tax Return, Form 1120, of Three Rivers Provider Network for the calendar year 2007. The return and attached Line 26 itemized schedule were false and fraudulent as to material matters, in that: (a) the return reported gross receipts or sales on line 1a of \$9,020,838, whereas, defendant BLAINE POLLOCK knew and believed that the correct gross receipts or sales was in excess of the amount reported on the tax return; (b) the return represented that Three Rivers Provider Network was entitled under the provisions of the Internal Revenue laws to claim other deductions on line 26 of \$5,569,997, whereas, defendant BLAINE POLLOCK knew and believed that this amount exceeded the deductions Three Rivers Provider Network was entitled to claim on line 26 for the calendar year 2007; and (c) the Line 26 itemized schedule represented that Three Rivers Provider Network had incurred \$1,316,235 in deductible "technology fees," whereas, defendant BLAINE POLLOCK knew and believed that this amount exceeded the actual technology fees incurred by Three Rivers Provider Network for the calendar year 2007. All in violation of Title 26, United States Code, Section 7206(2).

Count 7

(Aiding and Assisting False Statement on TRPN Corporate Tax Return)

In or about 2009, within the Southern District of California, defendant BLAINE POLLOCK did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal

1 Revenue Service, of a U.S. Corporation Income Tax Return, Form 1120,
2 of Three Rivers Provider Network for the calendar year 2008. The
3 return and attached Line 26 itemized schedule were false and
4 fraudulent as to material matters, in that: (a) the return reported
5 gross receipts or sales on line 1a of \$9,193,188, whereas, defendant
6 BLAINE POLLOCK knew and believed that the correct gross receipts or
7 sales was in excess of the amount reported on the tax return; (b) the
8 return represented that Three Rivers Provider Network was entitled
9 under the provisions of the Internal Revenue laws to claim other
10 deductions on line 26 of \$5,411,368, whereas, defendant BLAINE POLLOCK
11 knew and believed that this amount exceeded the deductions Three
12 Rivers Provider Network was entitled to claim on line 26 for the
13 calendar year 2008; and (c) the Line 26 itemized schedule represented
14 that Three Rivers Provider Network had incurred \$1,175,618 in
15 deductible "technology fees," whereas, defendant BLAINE POLLOCK knew
16 and believed that this amount exceeded the actual technology fees
17 incurred by Three Rivers Provider Network for the calendar year 2008.
18 All in violation of Title 26, United States Code, Section 7206(2).

19 Count 8

20 (Aiding and Assisting False Statement on TRPN Corporate Tax Return)
21 In or about 2010, within the Southern District of California,
22 defendant BLAINE POLLOCK did willfully aid and assist in, and procure,
23 counsel, and advise the preparation and presentation to the Internal
24 Revenue Service, of a U.S. Corporation Income Tax Return, Form 1120,
25 of Three Rivers Provider Network for the calendar year 2009. The
26 return and attached Line 26 itemized schedule were false and
27 fraudulent as to material matters, in that: (a) the return reported
28 gross receipts or sales on line 1a of \$12,104,120, whereas, defendant

1 BLAINE POLLOCK knew and believed that the correct gross receipts or
2 sales was in excess of the amount reported on the tax return; (b) the
3 return represented that Three Rivers Provider Network was entitled
4 under the provisions of the Internal Revenue laws to claim other
5 deductions on line 26 of \$7,077,138, whereas, defendant BLAINE POLLOCK
6 knew and believed that this amount exceeded the deductions Three
7 Rivers Provider Network was entitled to claim on line 26 for the
8 calendar year 2009; and (c) the Line 26 itemized schedule represented
9 that Three Rivers Provider Network had incurred \$1,260,851 in
10 deductible "technology fees," whereas, defendant BLAINE POLLOCK knew
11 and believed that this amount exceeded the actual technology fees
12 incurred by Three Rivers Provider Network for the calendar year 2009.
13 All in violation of Title 26, United States Code, Section 7206(2).

14 Count 9

15 (Aiding and Assisting False Statement on MCS Corporate Tax Return)

16 In or about 2007, within the Southern District of California,
17 defendant BLAINE POLLOCK did willfully aid and assist in, and procure,
18 counsel, and advise the preparation and presentation to the Internal
19 Revenue Service, of a U.S. Corporation Income Tax Return, Form 1120,
20 of Managed Care Strategies, Inc. for the calendar year 2006. The
21 return and attached Line 26 itemized schedule were false and
22 fraudulent as to material matters, in that: (a) the return represented
23 that Managed Care Strategies, Inc. was entitled under the provisions
24 of the Internal Revenue laws to claim other deductions on line 26 of
25 \$775,137, whereas, defendant BLAINE POLLOCK knew and believed that
26 this amount exceeded the deductions Managed Care Strategies, Inc. was
27 entitled to claim on line 26 for the calendar year 2006; and (b) the
28 Line 26 itemized schedule represented that Managed Care Strategies,

1 Inc. had incurred \$404,000 in deductible "technology fees," whereas,
2 defendant BLAINE POLLOCK knew and believed that this amount exceeded
3 the actual technology fees incurred by Managed Care Strategies, Inc.
4 for the calendar year 2006.

5 All in violation of Title 26, United States Code, Section 7206(2).

6 Count 10

7 (Aiding and Assisting False Statement on MCS Corporate Tax Return)

8 In or about 2008, within the Southern District of California,
9 defendant BLAINE POLLOCK did willfully aid and assist in, and procure,
10 counsel, and advise the preparation and presentation to the Internal
11 Revenue Service, of a U.S. Corporation Income Tax Return, Form 1120,
12 of Managed Care Strategies, Inc. for the calendar year 2007. The
13 return and attached Line 26 itemized schedule were false and
14 fraudulent as to material matters, in that: (a) the return represented
15 that Managed Care Strategies, Inc. was entitled under the provisions
16 of the Internal Revenue laws to claim other deductions on line 26 of
17 \$485,040, whereas, defendant BLAINE POLLOCK knew and believed that
18 this amount exceeded the deductions Managed Care Strategies, Inc. was
19 entitled to claim on line 26 for the calendar year 2007; and (b) the
20 Line 26 itemized schedule represented that Managed Care Strategies,
21 Inc. had incurred \$390,000 in deductible "technology fees," whereas,
22 defendant BLAINE POLLOCK knew and believed that this amount exceeded
23 the actual technology fees incurred by Managed Care Strategies, Inc.
24 for the calendar year 2007.

25 All in violation of Title 26, United States Code, Section 7206(2).

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Count 11

(Aiding and Assisting False Statement on MCS Corporate Tax Return)

In or about 2009, within the Southern District of California, defendant BLAINE POLLOCK did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service, of a U.S. Corporation Income Tax Return, Form 1120, of Managed Care Strategies, Inc. for the calendar year 2008. The return and attached Line 26 itemized schedule were false and fraudulent as to material matters, in that: (a) the return represented that Managed Care Strategies, Inc. was entitled under the provisions of the Internal Revenue laws to claim other deductions on line 26 of \$697,925, whereas, defendant BLAINE POLLOCK knew and believed that this amount exceeded the deductions Managed Care Strategies, Inc. was entitled to claim on line 26 for the calendar year 2008; and (b) the Line 26 itemized schedule represented that Managed Care Strategies, Inc. had incurred \$323,554 in deductible "technology fees," whereas, defendant BLAINE POLLOCK knew and believed that this amount exceeded the actual technology fees incurred by Managed Care Strategies, Inc. for the calendar year 2008.

All in violation of Title 26, United States Code, Section 7206(2).

Count 12

(Aiding and Assisting False Statement on MCS Corporate Tax Return)

In or about 2010, within the Southern District of California, defendant BLAINE POLLOCK did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service, of a U.S. Corporation Income Tax Return, Form 1120, of Managed Care Strategies, Inc. for the calendar year 2009. The return and attached Line 26 itemized schedule were false and

1 fraudulent as to material matters, in that: (a) the return represented
2 that Managed Care Strategies, Inc. was entitled under the provisions
3 of the Internal Revenue laws to claim other deductions on line 26 of
4 \$744,127, whereas, defendant BLAINE POLLOCK knew and believed that
5 this amount exceeded the deductions Managed Care Strategies, Inc. was
6 entitled to claim on line 26 for the calendar year 2009; and (b) the
7 Line 26 itemized schedule represented that Managed Care Strategies,
8 Inc. had incurred \$712,695 in deductible "technology fees," whereas,
9 defendant BLAINE POLLOCK knew and believed that this amount exceeded
10 the actual technology fees incurred by Managed Care Strategies, Inc.
11 for the calendar year 2009.

12 All in violation of Title 26, United States Code, Section 7206(2).

13 Count 13

14 (Conspiracy)

15 Beginning on a date unknown to the grand jury, but no later than
16 2005, and continuing to a date unknown to the grand jury, but through
17 at least March 17, 2011, within the Southern District of California,
18 and elsewhere, defendant BLAINE POLLOCK did knowingly conspire with
19 others known and unknown to the grand jury to defraud the
20 United States for the purpose of impeding, obstructing, and defeating
21 the lawful functions of the Internal Revenue Service in the
22 ascertainment, computation, assessment and collection of income taxes.

23 MANNER AND MEANS

24 In furtherance of the conspiracy, and to effect the objects
25 thereof, defendant BLAINE POLLOCK and his co-conspirators utilized the
26 following manner and means among others:

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1 1. Defendant BLAINE POLLOCK and his co-conspirators caused
2 Three Rivers Provider Network and Managed Care Strategies to transfer
3 funds to overseas entities controlled by defendant BLAINE POLLOCK and
4 his co-conspirators for his personal benefit without reporting those
5 funds as income to him on his personal income tax returns.

6 2. Defendant BLAINE POLLOCK and his co-conspirators held the
7 funds transferred from Three Rivers Provider Network and Managed Care
8 Strategies and utilized the funds to make purchases for defendant
9 BLAINE POLLOCK's benefit. Defendant BLAINE POLLOCK did not report
10 those purchases on his personal income tax returns.

11 3. Defendant BLAINE POLLOCK and his co-conspirators caused
12 Three Rivers Provider Network and Managed Care Strategies to transfer
13 funds to domestic entities for defendant BLAINE POLLOCK's personal
14 benefit without reporting those funds as income to him on his personal
15 income tax returns.

16 4. Defendant BLAINE POLLOCK and his co-conspirators caused
17 Three Rivers Provider Network and Managed Care Strategies to falsely
18 record the foregoing transfers to overseas and domestic entities as
19 business expenses and to improperly include those expenses as
20 deductions on corporate income tax returns.

21 5. Defendant BLAINE POLLOCK and his co-conspirators caused
22 Three Rivers Provider Network to hold funds in "off the books" bank
23 accounts for defendant BLAINE POLLOCK's personal benefit without
24 reporting those funds as income to him on his personal income tax
25 returns.

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1 6. Defendant BLAINE POLLOCK and his co-conspirators caused
2 Three Rivers Provider Network not to record funds held in the "off the
3 books" bank accounts in corporate records and not to report those
4 funds as income on corporate tax returns.

5 7. Defendant BLAINE POLLOCK and his co-conspirators caused
6 Three Rivers Provider Network and other entities to make purchases and
7 expenditures for defendant BLAINE POLLOCK's personal benefit without
8 reporting those purchases and expenditures as income to him on his
9 personal income tax returns.

10 OVERT ACTS

11 In furtherance of said conspiracy and to effect and accomplish
12 the objects thereof, the following overt acts, among others, were
13 committed within the Southern District of California, and elsewhere:

14 1. Between 2005 and 2009, defendant BLAINE POLLOCK caused Three
15 Rivers Provider Network to transfer approximately \$3,782,433 to a
16 Gibraltar account held by Professional & Corporate Trust, an overseas
17 entity.

18 2. Between 2006 and 2009, defendant BLAINE POLLOCK caused
19 Managed Care Strategies to transfer approximately \$1,080,000 to a
20 Gibraltar account held by Professional & Corporate Trust, an overseas
21 entity.

22 3. Between 2009 and 2010, defendant BLAINE POLLOCK caused Three
23 Rivers Provider Network to transfer approximately \$1,081,693 to a
24 Liechtenstein account held by Leeward Trust, an overseas entity.

25 4. Between 2009 and 2010, defendant BLAINE POLLOCK caused
26 Managed Care Strategies to transfer approximately \$600,000 to a
27 Liechtenstein account held by Leeward Trust, an overseas entity.

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1 5. In 2010, defendant BLAINE POLLOCK caused World Health
2 Education Organization Foundation to transfer approximately \$507,923
3 to a Liechtenstein account held by Leeward Trust, an overseas entity.

4 6. Between 2005 and 2009, Professional & Corporate Trust
5 transferred funds received from Three Rivers Provider Network and
6 Managed Care Strategies to a Gibraltar account held by Paloma
7 Holdings, Ltd., an overseas entity.

8 7. Between 2009 and 2010, Leeward Trust transferred funds
9 received from Three Rivers Provider Network and Managed Care
10 Strategies to a Liechtenstein subaccount held by Harbour Holdings, an
11 overseas entity.

12 8. Defendant BLAINE POLLOCK caused Three Rivers Provider
13 Network and Managed Care Strategies to record the transfers to
14 Professional & Corporate Trust and Leeward Trust as legitimate
15 business expenses, such as "technology fees," notwithstanding that
16 neither Professional & Corporate Trust nor Leeward Trust provided any
17 such services to Three Rivers Provider Network or Managed Care
18 Strategies.

19 9. In 2005, defendant BLAINE POLLOCK caused Three Rivers
20 Provider Network to transfer approximately \$6,787 to domestic entities
21 for his personal benefit.

22 10. In 2006, defendant BLAINE POLLOCK caused Three Rivers
23 Provider Network to transfer approximately \$450,000 to domestic
24 entities for his personal benefit.

25 11. In 2007, defendant BLAINE POLLOCK caused Three Rivers
26 Provider Network to transfer approximately \$540,000 to domestic
27 entities for his personal benefit.

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1 12. In 2008, defendant BLAINE POLLOCK caused Three Rivers
2 Provider Network to transfer approximately \$40,000 to domestic
3 entities for his personal benefit.

4 13. In 2009, defendant BLAINE POLLOCK caused Three Rivers
5 Provider Network to transfer approximately \$294,891 to domestic
6 entities for his personal benefit.

7 14. In 2010, defendant BLAINE POLLOCK caused Three Rivers
8 Provider Network to transfer approximately \$439,368 to domestic
9 entities for his personal benefit.

10 15. In 2010, defendant BLAINE POLLOCK caused World Health
11 Education Organization Foundation to transfer approximately \$251,103
12 to domestic entities for his personal benefit.

13 16. In 2007, defendant BLAINE POLLOCK caused approximately \$1.2
14 million to be deposited in a Bank of America account held by Three
15 Rivers Provider Network and maintained "off the books."

16 17. In 2008, defendant BLAINE POLLOCK caused approximately
17 \$395,000 to be deposited in a Bank of America account held by Three
18 Rivers Provider Network and maintained "off the books."

19 18. In 2009, defendant BLAINE POLLOCK caused approximately
20 \$767,000 to be deposited in a Bank of America account held by Three
21 Rivers Provider Network and maintained "off the books."

22 19. In 2010, defendant BLAINE POLLOCK caused approximately
23 \$38,564 to be deposited in a Bank of America account held by Three
24 Rivers Provider Network and maintained "off the books."

25 20. In 2008, defendant BLAINE POLLOCK caused approximately
26 \$787,000 to be deposited in a Washington Mutual account held by Three
27 Rivers Provider Network and maintained "off the books."

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1 21. In 2009, defendant BLAINE POLLOCK caused Risk & General
2 Insurance to transfer approximately \$3.98 million to a Liechtenstein
3 account held by Leeward Trust, an overseas entity.

4 22. In 2006, defendant BLAINE POLLOCK caused a yacht to be
5 purchased for his personal benefit for approximately \$416,000 using
6 funds from Three Rivers Provider Network.

7 23. In 2006, defendant BLAINE POLLOCK caused a recreational
8 vehicle to be purchased for his personal benefit for approximately
9 \$166,000 using funds from Paloma Holdings, Ltd.

10 24. In 2007, defendant BLAINE POLLOCK caused a residence to be
11 purchased in Chula Vista, California for his personal benefit, for
12 approximately \$1.378 million using funds from, among other sources,
13 Three Rivers Provider Network and Doctors Receivable Support Group.

14 25. In 2007, defendant BLAINE POLLOCK caused Paloma Holdings,
15 Ltd. to transfer \$1.2 million to Doctors Receivable Support Group
16 pursuant to a loan agreement relating to the purchase of the residence
17 in Chula Vista, California described above.

18 26. In 2008, defendant BLAINE POLLOCK caused a residence to be
19 purchased in Coronado, California for his personal benefit for
20 approximately \$5.7 million using funds from Paloma Holdings, Ltd.;
21 Medical Claims Resolution, Inc.; Risk & General Insurance; and Three
22 Rivers Provider Network.

23 27. In 2008, defendant BLAINE POLLOCK caused a residence to be
24 purchased in the Philippines for his personal benefit for
25 approximately \$148,000 using funds from Paloma Holdings, Ltd.

26 28. In 2008, defendant BLAINE POLLOCK utilized funds from Paloma
27 Holdings, Ltd. to facilitate the purchase of a residence in Chula
28 Vista, California for the benefit of family members.

1 29. In 2009, defendant BLAINE POLLOCK caused a residence to be
2 purchased in San Francisco, California for his personal benefit, for
3 approximately \$2.4 million using funds from Professional & Corporate
4 Trust and Three Rivers Provider Network.

5 30. In 2010, defendant BLAINE POLLOCK caused a yacht to be
6 purchased for his personal benefit for approximately \$1.3 million
7 using funds from Leeward Trust and Harbour Holdings.

8 31. In 2007, defendant BLAINE POLLOCK caused Paloma Holdings,
9 Ltd. to transfer approximately \$600,000 to J.J.P., his spouse at the
10 time, pursuant to a Marital Settlement Agreement.

11 32. In 2008, defendant BLAINE POLLOCK caused Three Rivers
12 provider Network to transfer approximately \$100,000 to J.J.P. pursuant
13 to a Marital Settlement Agreement.

14 33. In 2009, defendant BLAINE POLLOCK caused Three Rivers
15 Provider Network to transfer approximately \$900,000 to Chateaus
16 Artiste, an entity controlled by J.J.P., pursuant to a Marital
17 Settlement Agreement.

18 34. In 2009, defendant BLAINE POLLOCK caused Three Rivers
19 Provider Network to transfer approximately \$108,000 to Chateaus
20 Artiste, an entity controlled by J.J.P.

21 35. In 2009, defendant BLAINE POLLOCK caused Paloma Holdings,
22 Ltd. to transfer approximately \$48,000 to Chateaus Artiste, an entity
23 controlled by J.J.P.

24 36. In 2010, defendant BLAINE POLLOCK caused World Health
25 Organization and Education Foundation to transfer approximately
26 \$207,834 to Chateaus Artiste, an entity controlled by J.J.P.

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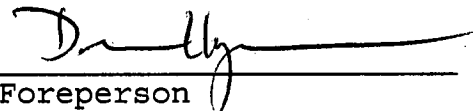
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1 37. Between 2005 and 2011, defendant BLAINE POLLOCK caused Three
2 Rivers Provider Network and other entities to make payments for his
3 personal benefit, including but not limited to travel, jewelry,
4 automobiles and weddings.

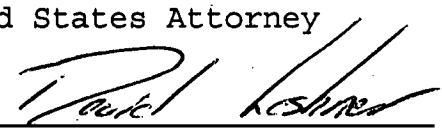
5 All in violation of Title 18, United States Code, Section 371.

6 DATED: June 27, 2013.

7 A TRUE BILL:

8 
9 Foreperson

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11 LAURA E. DUFFY
12 United States Attorney

13 By: 
14 DAVID D. LESHNER
15 Assistant U.S. Attorney
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